

Ashton Dennis

1/25/2021

1 (1)

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OKLAHOMA

3 MICHAEL PARGA, RICHARD FELTZ,
4 TARA O'DONLEY, and CHRISTOPHER
5 WOOD, on behalf of themselves
and all others similarly
situated,

6 Plaintiffs,

7 -vs-

Case No. 18-CV-0298-CVE-JFJ

8 BOARD OF COUNTY COMMISSIONERS
9 OF THE COUNTY OF TULSA, VIC
10 REGALADO, Tulsa County Sheriff,
in his official capacity;
11 TERRY H. BITTING, TAMMY BRUCE,
12 MARTHA RUPP CARTER, STEPHEN R.
CLARK, THERESA DREILING, OWEN
EVANS, JAMES W. KEELEY, DEBORAH
13 LUDI LEITCH, J. ANTHONY MILLER,
DAWN MOODY, MILLIE OTEY, KIRSTEN
14 PACE, APRIL SEIBERT, CLIFFORD
SMITH, and SARAH SMITH, in their
15 capacities as Tulsa County Special
Judges; and WILLIAM MUSSEMAN, in his
capacity as Tulsa County District
Judge,

16 Defendants.
17

18
19 DEPOSITION OF ASHTON DENNIS

20 TAKEN ON BEHALF OF THE DEFENDANTS

21 ON JANUARY 25, 2021, BEGINNING AT 9:03 A.M.

22 VIA ZOOM

23

24 REPORTED BY: Shannon S. Harwood, CSR, RPR, CRR

25

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Ashton Dennis

1/25/2021

2 (2 - 5)

<p>Page 2</p> <p>1 APPEARANCES</p> <p>2 on behalf of the PLAINTIFFS:</p> <p>3 Ms. Phoebe Kasdin Ms. Hayley Horowitz</p> <p>4 STILL SHE RISES 567 E. 36th Street North Tulsa, OK 74106 918-392-0867 phoebe@stillsheises.org hayleyh@stillsheises.org</p> <p>7 Ms. Alexandria Twiem 8 CIVIL RIGHTS CORPS 1601 Connecticut Ave. NW 9 Suite 800 Washington, DC 20009 alexandria@civilrightscorps.org 202-844-4975</p> <p>12 on behalf of the DEFENDANTS, BOARD OF COUNTY 13 COMMISSIONERS OF TULSA COUNTY, VIC REGALADO, TULSA COUNTY SHERIFF</p> <p>14 Mr. Doug Wilson TULSA COUNTY DISTRICT ATTORNEY'S OFFICE 15 500 South Denver Avenue Tulsa, OK 74103 918-596-4805 douglas.wilson@tulsacounty.org</p> <p>18 on behalf of the DEFENDANTS, TERRY H. BITTING, TAMMY 19 BRUCE, MARTHA RUPP CARTER, STEPHEN R. CLARK, THERESA DREILING, OWEN EVANS, JAMES W. KEELEY, DEBORAH LUDI LEITCH, J. ANTHONY MILLER, DAWN MOODY, MILLIE OTEY, 20 KIRSTEN PACE, APRIL SEIBERT, CLIFFORD SMITH, SARAH SMITH, and WILLIAM MUSSEMAN</p> <p>22 Ms. Erin Moore 23 Ms. Stefanie Lawson OKLAHOMA ATTORNEY GENERAL'S OFFICE 313 N.E. 21st Street Oklahoma City, OK 73105 405-521-3921 erin.moore@oag.ok.gov stefanie.lawson@oag.ok.gov</p>	<p>Page 4</p> <p>1 STIPULATIONS</p> <p>2</p> <p>3 It is hereby stipulated and agreed by and</p> <p>4 between the parties hereto, through their respective</p> <p>5 attorneys, that the deposition of ASHTON DENNIS may be</p> <p>6 taken pursuant to agreement and notice and in accordance</p> <p>7 with the Federal Rules of Civil Procedure on January 25,</p> <p>8 2020, via zoom, before Shannon S. Harwood, CSR, RPR,</p> <p>9 CRR.</p>
<p>Page 3</p> <p>1 INDEX</p> <p>2 PAGE</p> <p>3 Direct Examination by Ms. Moore 5</p> <p>4 Cross Examination by Mr. Wilson 26</p>	<p>Page 5</p> <p>1 WHEREUPON,</p> <p>2 ASHTON DENNIS,</p> <p>3 after having been first duly sworn, deposes and says in</p> <p>4 reply to questions propounded as follows, to-wit:</p> <p>5 DIRECT EXAMINATION</p> <p>6 BY MS. MOORE:</p> <p>7 Q. Mr. Dennis, can you hear me?</p> <p>8 A. Yes.</p> <p>9 Q. Hi. My name is Erin Moore and I'm going to be</p> <p>10 taking your deposition today. If you can't hear me</p> <p>11 because of buffering or something, try to indicate that</p> <p>12 because sometimes there's some lag and things with the</p> <p>13 computers and I want to make sure you can hear us.</p> <p>14 Okay?</p> <p>15 A. Okay.</p> <p>16 Q. So that's the first thing I want you to do is</p> <p>17 if there seems to be some technical problem, let us know</p> <p>18 because I want you to be able to hear me. Yeah, I think</p> <p>19 you just went into buffering. Is that me or is it on</p> <p>20 your end?</p> <p>21 MR. WILSON: I don't think it's you, Erin.</p> <p>22 MS. MOORE: It's not me? Phoebe?</p> <p>23 MR. WILSON: Might be now.</p> <p>24 MS. MOORE: It might be now. Hello?</p> <p>25 MS. LAWSON: No, they're frozen on my screen</p>

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Ashton Dennis

1/25/2021

3 (6 - 9)

<p>Page 6</p> <p>1 too.</p> <p>2 MS. MOORE: Okay. Yeah, Phoebe, we've lost</p> <p>3 Mr. Dennis. Can you hear me?</p> <p>4 MR. WILSON: Are we down a wifi connection.</p> <p>5 MS. KASDIN: I can hear you now. I lost you</p> <p>6 too. Let me check his. I'm so sorry. Hold on.</p> <p>7 MS. MOORE: We lost him. He -- he froze</p> <p>8 first.</p> <p>9 THE REPORTER: And, Mr. Wilson, I can barely</p> <p>10 hear you.</p> <p>11 MR. WILSON: Okay. Is that better?</p> <p>12 THE REPORTER: That's better. Thank you so</p> <p>13 much.</p> <p>14 MR. WILSON: Erin, did we want to enter into</p> <p>15 the same stipulations as the other depositions?</p> <p>16 MS. MOORE: Yeah, I guess we do. I mean,</p> <p>17 since we -- especially since we did that agreement by</p> <p>18 email yesterday -- that day, so I guess, yeah.</p> <p>19 MS. HOROWITZ: I mean, I can do this while</p> <p>20 Phoebe is --</p> <p>21 MS. MOORE: Okay.</p> <p>22 MS. HOROWITZ: -- helping get the tech set up.</p> <p>23 I mean, everything that we've agreed to --</p> <p>24 MS. MOORE: Before --</p> <p>25 MS. HOROWITZ: -- by email or otherwise, we</p>	<p>Page 8</p> <p>1 the record.</p> <p>2 Most of the time, you'll still answer the</p> <p>3 question. The only time you will not answer a question</p> <p>4 after they object is if they specifically direct you not</p> <p>5 to answer the question, so -- but if you don't</p> <p>6 understand the question, I need you to tell me, "I don't</p> <p>7 understand the question" and I will try to rephrase it</p> <p>8 or work through what you're not understanding so we can</p> <p>9 get to a question and get the information out of you in</p> <p>10 a way that you understand and I understand. If you</p> <p>11 answer a question without telling me that you don't</p> <p>12 understand, I'm going to assume you understood the</p> <p>13 question.</p> <p>14 Does that make sense?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. Again, can you hear me okay?</p> <p>17 A. Yes.</p> <p>18 Q. All right. Is there anything that is going to</p> <p>19 prevent you today from being able to give truthful and</p> <p>20 accurate testimony about what you remember?</p> <p>21 A. No.</p> <p>22 Q. Okay. Have you ever been deposed before?</p> <p>23 A. No.</p> <p>24 Q. Okay. Have you ever testified in a court</p> <p>25 proceeding?</p>
<p>Page 7</p> <p>1 agree applies.</p> <p>2 MS. MOORE: Okay. All right. That -- that</p> <p>3 works. I figured we were, but just keeping -- keep it</p> <p>4 on the record, so thanks, Doug. Are we back on, Phoebe?</p> <p>5 Q. (By Mr. Moore) Mr. Dennis can you hear me?</p> <p>6 A. Yes, I can hear you.</p> <p>7 Q. Okay. So we -- you've seen now what the</p> <p>8 technical problems look like, that you freeze up, you</p> <p>9 can't hear me, so if that happens again or -- or</p> <p>10 something, we'll try to get it resolved, but tell me</p> <p>11 what you didn't hear when we get it back resolved so I</p> <p>12 know how to go backwards to get us back where we're</p> <p>13 starting where you know what I'm saying.</p> <p>14 Does that make sense?</p> <p>15 A. Well -- well, you were just into your</p> <p>16 introduction --</p> <p>17 Q. Okay.</p> <p>18 A. -- when you cut off.</p> <p>19 Q. All right. So starting again. I'm going to</p> <p>20 be asking you questions. I want -- and with the</p> <p>21 technology issues, wait a couple seconds before you</p> <p>22 start answering anything. That will allow me to finish</p> <p>23 my question, make sure you hear it, and it also gives</p> <p>24 your counsel a chance to interject an objection or</p> <p>25 something in case they want to preserve something for</p>	<p>Page 9</p> <p>1 A. Yes.</p> <p>2 Q. Okay. Where you were under oath like you just</p> <p>3 were?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. You've done that. Okay. So this is</p> <p>6 actually just the same as that, but the judge just isn't</p> <p>7 here. That's -- so think of it that way. It's just</p> <p>8 like being in front of a judge. What did you testify in</p> <p>9 before?</p> <p>10 A. My criminal -- past criminal cases.</p> <p>11 Q. Okay. Have you had any non criminal cases</p> <p>12 that you've testified in, like paternity or car</p> <p>13 accidents?</p> <p>14 A. No.</p> <p>15 Q. Okay. Can you tell me your full name?</p> <p>16 A. Ashton Lee Dennis.</p> <p>17 Q. Okay. And can you spell that for me?</p> <p>18 A. A-S-H-T-O-N, Lee, L-E-E, Dennis, D-E-N-N-I-S.</p> <p>19 Q. All right. Thank you. And where do you live?</p> <p>20 A. Tulsa.</p> <p>21 Q. Can you tell me an address?</p> <p>22 A. 2201 North Quannah Avenue.</p> <p>23 Q. Okay. And who do you live with?</p> <p>24 A. My sister.</p> <p>25 Q. Your sister. Okay. Do you have any children?</p>

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Ashton Dennis

1/25/2021

4 (10 - 13)

<p style="text-align: right;">Page 10</p> <p>1 A. I have three.</p> <p>2 Q. You have three. Okay. And do they have the</p> <p>3 same mother or do they have multiple mothers?</p> <p>4 A. No, they have the same mother.</p> <p>5 Q. And who -- what's her name?</p> <p>6 A. Tisha Abdual.</p> <p>7 Q. Okay. Can you try to spell that for me? I</p> <p>8 didn't understand.</p> <p>9 A. T-I-S-H-A, Abdual, A-B-D-U-A-L.</p> <p>10 Q. Okay. And where does she live?</p> <p>11 A. Houston, Texas.</p> <p>12 Q. Okay. And what's your sister's name?</p> <p>13 A. India Dennis.</p> <p>14 Q. Okay. Do you have any other siblings?</p> <p>15 A. Yes, I have three other brothers.</p> <p>16 Q. And what are their names?</p> <p>17 A. Nick Dennis, Isaac Dennis and Jeremy Dennis.</p> <p>18 Q. Okay. Where do they live?</p> <p>19 A. Here in Tulsa.</p> <p>20 Q. Okay. Do you have any grandparents or aunts</p> <p>21 and uncles or parents?</p> <p>22 A. Grandparents are passed. Mother is passed.</p> <p>23 Father is passed. I do have three aunts that stay</p> <p>24 here in Tulsa.</p> <p>25 Q. Okay. What are their names?</p>	<p style="text-align: right;">Page 12</p> <p>1 A. I have osteobrocosis (sic) and scoliosis.</p> <p>2 Q. Okay. All right. Can you tell me how much</p> <p>3 education you've -- or schooling you have completed?</p> <p>4 A. High school graduate, 2004.</p> <p>5 Q. Where did you graduate from?</p> <p>6 A. Broken Arrow High School.</p> <p>7 Q. Okay. That's a good school. Did you take any</p> <p>8 medications?</p> <p>9 A. No.</p> <p>10 Q. Okay. Do you have any hearing problems?</p> <p>11 A. No.</p> <p>12 Q. All right. So I don't want to talk about why</p> <p>13 or what happened to get you arrested, so we're going to</p> <p>14 start after you get arrested on December 15th, 2020.</p> <p>15 Okay. Because that's what at issue right now.</p> <p>16 Do you understand that?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. So after you're arrested, what</p> <p>19 happened?</p> <p>20 MS. KASDIN: Object to the form of the</p> <p>21 question.</p> <p>22 Q. (By Ms. Moore) Okay. Did you understand that</p> <p>23 question or do I need to rephrase, Mr. Dennis?</p> <p>24 A. I understood.</p> <p>25 Q. Okay. What physically happened to you after</p>
<p style="text-align: right;">Page 11</p> <p>1 A. Patricia, Carolyn -- oh, I don't -- I call my</p> <p>2 third auntie -- her name is -- I can't remember her</p> <p>3 first name, just -- we call her babe.</p> <p>4 Q. That's okay. That's okay. I understand, you</p> <p>5 know, there are names and they're not necessarily their</p> <p>6 legal names. That's okay. Do you have a cell phone?</p> <p>7 A. Yes, I do.</p> <p>8 Q. Okay. What kind of cell phone do you have?</p> <p>9 A. The carrier or the phone device?</p> <p>10 Q. Both actually.</p> <p>11 A. Well, I'm with Assist Wireless and I have an</p> <p>12 iPhone 8 Plus.</p> <p>13 Q. Okay. Thank you. Do you have a car?</p> <p>14 A. No, I don't.</p> <p>15 Q. Okay. Do you have access to a car?</p> <p>16 A. I mean, through family, yes.</p> <p>17 Q. Okay. Do you currently work?</p> <p>18 A. No.</p> <p>19 Q. Okay. Are you on disability?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. And when were you approved for</p> <p>22 disability?</p> <p>23 A. Since birth.</p> <p>24 Q. Since birth. Okay. And can you describe your</p> <p>25 disability for me?</p>	<p style="text-align: right;">Page 13</p> <p>1 you were arrested?</p> <p>2 A. I was transported to the David L. Moss</p> <p>3 Correctional Facility.</p> <p>4 Q. Okay. And who transported you there?</p> <p>5 A. Tulsa Police Department.</p> <p>6 Q. Okay. And did the Tulsa Police Department</p> <p>7 tell you anything about what you were charged with or</p> <p>8 why you were being booked into the jail?</p> <p>9 MS. KASDIN: Object to the form of the</p> <p>10 question.</p> <p>11 Q. (By Ms. Moore) Did you understand that,</p> <p>12 Mr. Dennis?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. What did -- what did Tulsa Police</p> <p>15 Department tell you while they were booking you in?</p> <p>16 A. Allegations of stolen property, stolen car and</p> <p>17 stolen firearm.</p> <p>18 Q. Okay. Did they tell you anything about bond</p> <p>19 amounts?</p> <p>20 A. No, not...</p> <p>21 Q. And that was the Tulsa Police Department did</p> <p>22 not tell you anything?</p> <p>23 A. No.</p> <p>24 Q. Okay. All right. So you're -- you're now at</p> <p>25 the jail and you're being booked in. Do you know who is</p>

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Ashton Dennis

1/25/2021

5 (14 - 17)

<p>Page 14</p> <p>1 booking you in?</p> <p>2 A. Employee for the David L. Moss Correctional</p> <p>3 Facility.</p> <p>4 Q. Okay. And what did they do?</p> <p>5 A. Took pictures. Once the pictures was taken,</p> <p>6 they gave me a printout of my charges and my court date,</p> <p>7 and I was instructed to sit down.</p> <p>8 Q. Did the printout contain information about</p> <p>9 bond amounts?</p> <p>10 A. No.</p> <p>11 Q. Okay. Were you told about bond amounts at</p> <p>12 booking?</p> <p>13 A. I asked.</p> <p>14 Q. You asked?</p> <p>15 A. But they --</p> <p>16 Q. Okay. What did they tell you about bond</p> <p>17 amounts?</p> <p>18 A. She just written down what my bond was for the</p> <p>19 charges I was in -- in for.</p> <p>20 Q. She wrote it down for you?</p> <p>21 A. Correct.</p> <p>22 Q. Okay. And was that on the charge sheet or on</p> <p>23 a different piece of paper?</p> <p>24 A. On the charges, charge sheet.</p> <p>25 Q. Were you told about your next court date?</p>	<p>Page 16</p> <p>1 jail?</p> <p>2 A. Went to dress out.</p> <p>3 Q. Okay. And what happens in dress out?</p> <p>4 A. I took off all my street clothes, what they</p> <p>5 call them, was handed their inmate clothing and told me</p> <p>6 to, I guess, squat or bend over, make sure I didn't have</p> <p>7 any -- anything in my rectum.</p> <p>8 Q. Okay. All right. So you're dressed out and</p> <p>9 changed into the jail clothes. What happens next?</p> <p>10 A. Took to the quarantine pod.</p> <p>11 Q. What did they tell you about quarantine pod?</p> <p>12 A. Nothing. I was instructed the -- they told me</p> <p>13 what actually cell I was in, which was a handicapped</p> <p>14 cell and that was that.</p> <p>15 Q. Did you tell them that you had a handicap</p> <p>16 issue?</p> <p>17 A. No, I mean, for -- from the eyes can see, I'm</p> <p>18 pretty physically -- I mean, they can tell I have</p> <p>19 something wrong with me.</p> <p>20 Q. Okay. Well, I just wanted to make sure I</p> <p>21 understood why you got put in a handicapped cell. So</p> <p>22 they noted your handi -- your disability and your</p> <p>23 handicap?</p> <p>24 A. Correct.</p> <p>25 Q. Okay. And you're in the quarantine pod. Are</p>
<p>Page 15</p> <p>1 A. Yeah, it was listed on the piece of paper</p> <p>2 printout.</p> <p>3 Q. Did they tell you anything else about it?</p> <p>4 A. No.</p> <p>5 Q. Okay. So you were given the piece of paper</p> <p>6 and told to go sit in a room?</p> <p>7 A. I was in the booking area.</p> <p>8 Q. In the booking area. Okay. Did you still</p> <p>9 have access to your phone?</p> <p>10 A. No.</p> <p>11 Q. Okay. Did you have access to a phone to make</p> <p>12 calls?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. Did you call anyone?</p> <p>15 A. Yes, I did.</p> <p>16 Q. Who did you call?</p> <p>17 A. I contacted my kids and my bail bondsman.</p> <p>18 Q. Which bail bondsman did you contact?</p> <p>19 A. His name is James Pharr. P-H-A-R-R.</p> <p>20 Q. Okay. And how long were you in booking or the</p> <p>21 booking area, sorry?</p> <p>22 A. Probably like an hour or two maybe.</p> <p>23 Q. Okay. Did you make any other phone calls?</p> <p>24 A. No.</p> <p>25 Q. Okay. After booking, where did you go in the</p>	<p>Page 17</p> <p>1 you told when they'll come back for you for your next</p> <p>2 court date?</p> <p>3 A. No. It was the next day.</p> <p>4 Q. Okay. When did they come to get you for your</p> <p>5 next court date? Do you remember the time?</p> <p>6 A. Oh, the next morning. About 6, a little bit</p> <p>7 after breakfast.</p> <p>8 Q. Okay. So after breakfast. And do they tell</p> <p>9 you anything then about the court date?</p> <p>10 A. No, the DO woke me up and told me that I had</p> <p>11 court.</p> <p>12 Q. Uh-huh. And they -- they came to get you for</p> <p>13 court and what -- what happened when they came to get</p> <p>14 you for court?</p> <p>15 A. Well, I was let go from the pod to the video</p> <p>16 arraignment or video court and I was instructed --</p> <p>17 instructed to sit down and wait for the judge.</p> <p>18 Q. Okay.</p> <p>19 A. On a prompter.</p> <p>20 Q. Did anyone tell you this was a bond hearing?</p> <p>21 A. No.</p> <p>22 Q. Were there any signs telling you what -- what</p> <p>23 kind of hearing you could have?</p> <p>24 A. No.</p> <p>25 Q. Okay. Were there any jail personnel in the</p>

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Ashton Dennis

1/25/2021

6 (18 - 21)

<p>Page 18</p> <p>1 video courtroom?</p> <p>2 A. Yes.</p> <p>3 Q. Did they say anything before the docket</p> <p>4 happened?</p> <p>5 A. Yeah, I was told it was a bond hearing.</p> <p>6 Q. Okay. And did they say anything more than</p> <p>7 that?</p> <p>8 A. No.</p> <p>9 Q. Okay. What happened -- tell me about the bond</p> <p>10 hearing?</p> <p>11 MS. KASDIN: Object to form.</p> <p>12 Q. (By Ms. Moore) You're sitting in the bond --</p> <p>13 in this courtroom and what happens?</p> <p>14 A. Well, they -- as it was my turn, I was</p> <p>15 enlisted to come up to the podium and I was -- the judge</p> <p>16 was talking and I was told to remain quiet.</p> <p>17 Q. Who told you to remain quiet?</p> <p>18 A. The judge.</p> <p>19 Q. Judge did. Okay. Do you know who the judge</p> <p>20 was?</p> <p>21 A. No, not by name.</p> <p>22 Q. Okay. Were you told you had an attorney</p> <p>23 representing you?</p> <p>24 A. I was told the Public Defender's Office was</p> <p>25 there.</p>	<p>Page 20</p> <p>1 A. Yes.</p> <p>2 Q. Okay.</p> <p>3 A. Once -- after they gave me the new bond.</p> <p>4 Q. Okay. So they gave -- who gave you the new</p> <p>5 bond amount?</p> <p>6 A. The judge.</p> <p>7 Q. The judge. So you heard her say that?</p> <p>8 A. Correct.</p> <p>9 Q. Okay. Were you given any paper at the end of</p> <p>10 the hearing from someone in the David L. Moss facility?</p> <p>11 A. No, not that I can remember.</p> <p>12 Q. Okay. After the hearing was done, where did</p> <p>13 you go?</p> <p>14 A. Back to the pod.</p> <p>15 Q. Okay. How much was your bond after the</p> <p>16 hearing?</p> <p>17 A. About 4,000.</p> <p>18 Q. Okay. Did you call your bail bondsman back?</p> <p>19 A. No.</p> <p>20 Q. Okay. When was your next court appearance</p> <p>21 after the bail bond hearing?</p> <p>22 A. I don't remember the date.</p> <p>23 Q. Do you remember how many days after?</p> <p>24 A. Had to be a few -- couple days after --</p> <p>25 Q. Okay.</p>
<p>Page 19</p> <p>1 Q. Did the judge say anything before you were</p> <p>2 specifically called up to the podium to everyone?</p> <p>3 A. No, not really.</p> <p>4 Q. Okay.</p> <p>5 A. No, not that I can remember.</p> <p>6 Q. Okay. So the judge didn't -- you don't</p> <p>7 remember if the judge came on and told the entire</p> <p>8 courtroom what the purpose of the hearings were?</p> <p>9 A. I don't remember.</p> <p>10 Q. Okay. Okay. So you're up at the podium and</p> <p>11 what happens next?</p> <p>12 MS. KASDIN: Object to the form.</p> <p>13 A. They -- she were -- read off my charges,</p> <p>14 dismissed two of the charges that I had that was listed</p> <p>15 and she was talking back and forth with the DA and the</p> <p>16 Public Defender's Office.</p> <p>17 Q. (By Ms. Moore) Okay. Could you hear what</p> <p>18 they were saying?</p> <p>19 A. No.</p> <p>20 Q. Okay. But you heard her dismiss two of the</p> <p>21 charges, right?</p> <p>22 A. Correct.</p> <p>23 Q. Okay. Did she tell you your new bond amount?</p> <p>24 A. I think so.</p> <p>25 Q. Okay. And then your hearing was over?</p>	<p>Page 21</p> <p>1 A. -- the bail hearing.</p> <p>2 Q. Can you tell me about that hearing?</p> <p>3 A. It really wasn't too much there. I was -- the</p> <p>4 DO came to my cell and told me I need to go to court. I</p> <p>5 was released down to the video hearing. Once I got to</p> <p>6 the video court, I was told to fill out for pauper's</p> <p>7 affidavit for the Public Defender's Office.</p> <p>8 Q. Okay. And you filled that out?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And were you appointed a public</p> <p>11 defender?</p> <p>12 A. Not right then and there. no.</p> <p>13 Q. Well, at the hearing, were you appointed a</p> <p>14 public defender?</p> <p>15 A. No, after I filled out the paperwork, I was</p> <p>16 told to go back to the pod.</p> <p>17 Q. Okay. Did you see a judge that day?</p> <p>18 A. No.</p> <p>19 Q. You didn't stand at the podium?</p> <p>20 A. No.</p> <p>21 Q. Okay. Have you been appointed a public</p> <p>22 defender?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. Do you know what your current charges</p> <p>25 are against you?</p>

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Exhibit 16

Ashton Dennis

1/25/2021

7 (22 - 25)

<p style="text-align: right;">Page 22</p> <p>1 A. Yes.</p> <p>2 Q. Do they -- have you seen the Information filed</p> <p>3 against you?</p> <p>4 A. No.</p> <p>5 Q. Okay. Do you know which judge oversaw your</p> <p>6 arraignment?</p> <p>7 A. The first one or the --</p> <p>8 Q. The second one. Not the bond hearing, the</p> <p>9 second.</p> <p>10 A. Oh, no.</p> <p>11 Q. Okay. Back at the bond hearing, did the --</p> <p>12 did it -- the judge ask you about your ability -- what</p> <p>13 you could afford?</p> <p>14 A. No.</p> <p>15 Q. Did the judge ask you about employment?</p> <p>16 A. No.</p> <p>17 Q. Did the judge ask you about disability?</p> <p>18 A. No.</p> <p>19 Q. Okay. Prior to your bond hearing, did you</p> <p>20 fill out any paperwork?</p> <p>21 A. No.</p> <p>22 Q. Do you know who the presiding judge is?</p> <p>23 A. No.</p> <p>24 Q. Okay. Do you -- did you tell anyone at the</p> <p>25 bond hearing that you couldn't hear?</p>	<p style="text-align: right;">Page 24</p> <p>1 MS. KASDIN: Object to the form.</p> <p>2 A. Yes, the state pays, Tulsa Oklahoma.</p> <p>3 Q. (By Mr. Moore) Okay. And how do you get</p> <p>4 those payments?</p> <p>5 A. A debit card that -- through the Social</p> <p>6 Security Office, administration office.</p> <p>7 Q. Okay. Are you a member of a -- of an Indian</p> <p>8 tribe?</p> <p>9 A. No.</p> <p>10 Q. Okay. Do you have any Indian descent?</p> <p>11 A. Not that I'm aware of.</p> <p>12 Q. Okay. After the bond hearing, did you ask</p> <p>13 anyone to help you with bond?</p> <p>14 A. No.</p> <p>15 Q. Did you fill out an application for The Bail</p> <p>16 Project after the bond hearing?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. Did you call your sister about your</p> <p>19 bond?</p> <p>20 A. No.</p> <p>21 Q. Did you call one of your aunties?</p> <p>22 A. No.</p> <p>23 Q. You already said you didn't call your bail</p> <p>24 bondsman. That's correct?</p> <p>25 A. Correct.</p>
<p style="text-align: right;">Page 23</p> <p>1 A. (Shakes head in the negative.)</p> <p>2 Q. You -- do you know why the -- strike that.</p> <p>3 Do you know what -- strike that.</p> <p>4 Do you know what this lawsuit is about that</p> <p>5 I'm -- that you're testifying in?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. What's it about in your words?</p> <p>8 A. Well, from the understanding I have, it's to</p> <p>9 try to correct some wrongdoing in how they handle things</p> <p>10 in David L. Moss far as people coming in with high bonds</p> <p>11 and not able to pay.</p> <p>12 Q. Okay. What does ability to pay mean to you?</p> <p>13 MS. KASDIN: Object to the form.</p> <p>14 A. I guess their financial standpoint in life, if</p> <p>15 they're working, that type of thing.</p> <p>16 MS. MOORE: Okay. Let's take a five minute</p> <p>17 break right now. Okay?</p> <p>18 THE WITNESS: Yeah.</p> <p>19 MS. MOORE: Thank you.</p> <p>20 (A recess was taken from 9:31 a.m. to</p> <p>21 9:40 a.m.)</p> <p>22 Q. (By Ms. Moore) Mr. Dennis, we're back on the</p> <p>23 record and you're still under oath. So can you explain</p> <p>24 to me who is paying your disability payments?</p> <p>25 A. Who's paying?</p>	<p style="text-align: right;">Page 25</p> <p>1 Q. Do you know you're asking to intervene in a</p> <p>2 lawsuit?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. And do you know you're asking to</p> <p>5 intervene to be a class representative?</p> <p>6 A. Yes.</p> <p>7 Q. Do you understand what a class representative</p> <p>8 does?</p> <p>9 A. A bit.</p> <p>10 Q. Okay. Can you tell me what that bit of</p> <p>11 understanding is?</p> <p>12 A. I guess being a voice for the other inmates</p> <p>13 that's the same predicament that I was in, currently in.</p> <p>14 Q. Okay. And what do you -- if you were allowed</p> <p>15 to intervene, what do you want out of the lawsuit?</p> <p>16 A. I don't want anything in particular, just to</p> <p>17 -- I guess just to be a voice to -- for people that's in</p> <p>18 -- in custody or having problems or not having the</p> <p>19 ability to pay the bond amounts that the jailers give us</p> <p>20 or the judges give us.</p> <p>21 Q. What do you think the -- what do you think</p> <p>22 that should look like if you're given that voice? What</p> <p>23 -- how do you think the Court should correct?</p> <p>24 MS. KASDIN: Object to the form of the</p> <p>25 question.</p>

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1/25/2021

8 (26 - 29)

<p>Page 26</p> <p>1 A. I don't know.</p> <p>2 Q. (By Ms. Moore) You don't know. Okay.</p> <p>3 MS. MOORE: Doug, I'm going to pass the</p> <p>4 witness to you.</p> <p>5 THE WITNESS: I can't hear you, sir.</p> <p>6 MR. WILSON: Thank you. That's the quietest</p> <p>7 I've been in a long time.</p> <p>8 CROSS EXAMINATION</p> <p>9 BY MR. WILSON:</p> <p>10 Q. Mr. Dennis, I represent Sheriff Vic Regalado</p> <p>11 and the Tulsa County commissioners in this case and I've</p> <p>12 just got a couple -- a couple questions I'd like to ask.</p> <p>13 Okay?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Do you know Sheriff Vic Regalado? Have you</p> <p>16 ever met him?</p> <p>17 A. No, sir.</p> <p>18 Q. Okay. And am I correct that he was not</p> <p>19 involved directly in your arrest and detention at the</p> <p>20 jail?</p> <p>21 A. No.</p> <p>22 MS. KASDIN: Object to the form of the</p> <p>23 question.</p> <p>24 Q. (By Mr. Wilson) Okay. Did you have any</p> <p>25 interactions with the sheriff in your arrest or</p>	<p>Page 28</p> <p>1 make no effort to try and pay it?</p> <p>2 MS. KASDIN: Object to the form of the</p> <p>3 question.</p> <p>4 A. Because once you're in a pod, it's based off</p> <p>5 money. So if you don't have any money to use the phone.</p> <p>6 you don't have any access to the outside world.</p> <p>7 Q. (By Mr. Wilson) Well, you made phone calls</p> <p>8 while you were in jail, right?</p> <p>9 MS. KASDIN: Object to the form of the</p> <p>10 question.</p> <p>11 THE REPORTER: I'm sorry, I didn't hear the</p> <p>12 answer.</p> <p>13 A. Just in booking.</p> <p>14 Q. (By Mr. Wilson) Okay. Did people call you</p> <p>15 while you were in jail?</p> <p>16 A. No.</p> <p>17 Q. Did anyone with The Bail Project call you</p> <p>18 while you were in jail?</p> <p>19 A. No, sir.</p> <p>20 Q. And you did not call anyone with The Bail</p> <p>21 Project, correct?</p> <p>22 A. No, sir.</p> <p>23 Q. Okay. How is it that you and The Bail Project</p> <p>24 got together in December of 2020?</p> <p>25 MS. KASDIN: Object to the form of the</p>
<p>Page 27</p> <p>1 detention at the jail?</p> <p>2 A. I'm not sure.</p> <p>3 Q. Did you speak to him?</p> <p>4 A. No, no, no, no.</p> <p>5 Q. Okay. Did he speak to you?</p> <p>6 A. No, sir.</p> <p>7 Q. Okay. You didn't meet him at that time,</p> <p>8 correct?</p> <p>9 A. No, sir.</p> <p>10 Q. Okay. Have you ever met any of the county</p> <p>11 commissioners?</p> <p>12 A. No, sir.</p> <p>13 Q. Have any of them spoken to you?</p> <p>14 A. No, sir.</p> <p>15 Q. And have you spoken to any of them?</p> <p>16 A. No, sir.</p> <p>17 Q. Okay. Do you know George Foss?</p> <p>18 A. No, sir.</p> <p>19 Q. Okay. When the judge advised you at the bond</p> <p>20 docket that your bond was now \$4,000, did you take any</p> <p>21 steps to try and pay that bond?</p> <p>22 MS. KASDIN: Object to the form of the</p> <p>23 question.</p> <p>24 A. No, sir. I really couldn't.</p> <p>25 Q. (By Mr. Wilson) Why didn't -- why did you</p>	<p>Page 29</p> <p>1 question.</p> <p>2 A. I guess have to say through the -- I don't</p> <p>3 know what that little machine is called in jail.</p> <p>4 Computer email prompter kind of thing.</p> <p>5 Q. (By Mr. Wilson) Have you heard --</p> <p>6 A. Kiosk, kiosk.</p> <p>7 Q. Referred to it as a kiosk. So did you make a</p> <p>8 request through the kiosk?</p> <p>9 A. No.</p> <p>10 Q. Okay. Did The Bail Project reach out to you</p> <p>11 through the kiosk?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And after they did so, did you speak</p> <p>14 with them by phone?</p> <p>15 A. No.</p> <p>16 Q. After they did so, did you speak with them by</p> <p>17 video?</p> <p>18 A. Yes.</p> <p>19 Q. And did you speak with them about payment of</p> <p>20 your bail?</p> <p>21 A. Yes.</p> <p>22 Q. How many times prior to this had you been in</p> <p>23 jail?</p> <p>24 A. I would have to say about -- probably once or</p> <p>25 twice.</p>

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1/25/2021

9 (30 - 33)

<p style="text-align: right;">Page 30</p> <p>1 Q. In the previous times that you were in jail,</p> <p>2 did you bond out of either of those?</p> <p>3 A. No.</p> <p>4 Q. Did you make any effort to bond out on those</p> <p>5 occasions?</p> <p>6 A. No.</p> <p>7 Q. Have you ever pled guilty to any crimes?</p> <p>8 A. Yes.</p> <p>9 Q. What crimes have you pled guilty to?</p> <p>10 A. My previous charges. Possession with intent</p> <p>11 was one of them.</p> <p>12 Q. What are the others?</p> <p>13 A. Possession charges.</p> <p>14 Q. And were any of those felonies?</p> <p>15 A. Yes.</p> <p>16 MR. WILSON: If you'll give me five minutes,</p> <p>17 I'll try and go through my notes and wrap it up. Okay?</p> <p>18 THE WITNESS: Yes, sir.</p> <p>19 (A recess was taken from 9:52 a.m. to</p> <p>20 9:58 a.m.)</p> <p>21 A. Okay. Mr. Wilson, I was just -- when you</p> <p>22 asked me have I been in jail before this.</p> <p>23 Q. (By Mr. Wilson) Yes, sir.</p> <p>24 A. I have been in jail several other times due to</p> <p>25 traffic -- traffic infractions and stuff like that.</p>	<p style="text-align: right;">Page 32</p> <p>1 Q. When you need health care, who pays for that?</p> <p>2 A. I have insurance.</p> <p>3 Q. And what kind of insurance do you have?</p> <p>4 A. The state insurance, Medicare, Medicaid or</p> <p>5 however they pronounce that.</p> <p>6 Q. Is there a child support order entered</p> <p>7 somewhere against you?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. Do you know where?</p> <p>10 A. Here in Tulsa, Oklahoma. In Tulsa.</p> <p>11 Q. And at the time of that child support order,</p> <p>12 was disability your sole source of income?</p> <p>13 A. Yes.</p> <p>14 Q. Do you know approximately what year that was,</p> <p>15 sir?</p> <p>16 A. That they had the child support, no, I don't.</p> <p>17 Q. Do you make any extra money on top of your</p> <p>18 disability payments?</p> <p>19 A. No, I don't.</p> <p>20 Q. Okay. Was some of that money then used to buy</p> <p>21 the drugs that you were trafficking in that you were</p> <p>22 convicted of?</p> <p>23 MS. KASDIN: Object to the form of the</p> <p>24 question.</p> <p>25 A. No.</p>
<p style="text-align: right;">Page 31</p> <p>1 Q. So your disability, does it keep you from</p> <p>2 driving?</p> <p>3 A. No.</p> <p>4 Q. Do you have a driver's license?</p> <p>5 A. No, they're suspended.</p> <p>6 Q. And why was it suspended?</p> <p>7 A. Not having proof of insurance.</p> <p>8 Q. Of the \$700 that -- strike that.</p> <p>9 I don't know whether or not you stated how</p> <p>10 much in disability payments you get from Social Security</p> <p>11 or not. So let me just go ahead and ask that question.</p> <p>12 Do you know how much you get every month from Social</p> <p>13 Security disability?</p> <p>14 A. 751.</p> <p>15 Q. Okay.</p> <p>16 A. A month.</p> <p>17 Q. And can you tell me, what does that money go</p> <p>18 to pay?</p> <p>19 MS. KASDIN: Object to the form of the</p> <p>20 question.</p> <p>21 A. Child support, my housing. I pay my sister</p> <p>22 rent and stuff for the utilities.</p> <p>23 Q. (By Mr. Wilson) Groceries?</p> <p>24 A. Yes. My clothing and other things of that</p> <p>25 nature also.</p>	<p style="text-align: right;">Page 33</p> <p>1 Q. (By Mr. Wilson) Okay. How did you get money</p> <p>2 to purchase drugs?</p> <p>3 MS. KASDIN: Object to the form of the</p> <p>4 question.</p> <p>5 A. I'm not sure.</p> <p>6 Q. (By Mr. Wilson) Well, looks like your money</p> <p>7 gets spent on child support, housing, groceries,</p> <p>8 clothing and that kind of stuff, rent, utilities.</p> <p>9 Pretty much eats up all the 751 every month. Would you</p> <p>10 agree?</p> <p>11 A. Yep.</p> <p>12 Q. Okay. And you've already told me that you</p> <p>13 pled guilty to possession with intent, right?</p> <p>14 A. Correct.</p> <p>15 Q. And is that cocaine?</p> <p>16 A. Correct.</p> <p>17 Q. Okay. And you pled guilty to possession of</p> <p>18 cocaine before, correct?</p> <p>19 A. Yes.</p> <p>20 Q. And from what I understand, cocaine is not</p> <p>21 inexpensive, correct?</p> <p>22 A. Correct.</p> <p>23 MS. KASDIN: Object to the form of the</p> <p>24 question.</p> <p>25 Q. (By Mr. Wilson) So where do you get the money</p>

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10 (34 - 37)

<p style="text-align: right;">Page 34</p> <p>1 to purchase the cocaine?</p> <p>2 MS. KASDIN: Object to the form of the</p> <p>3 question.</p> <p>4 A. I don't know.</p> <p>5 Q. (By Mr. Wilson) Are you being truthful with</p> <p>6 me, sir?</p> <p>7 A. Yes, I am.</p> <p>8 MS. KASDIN: Object to the form of the</p> <p>9 question.</p> <p>10 Q. (By Mr. Wilson) You don't have any idea how</p> <p>11 you came by the money?</p> <p>12 MS. KASDIN: Object to the form of the</p> <p>13 question.</p> <p>14 A. Sorry.</p> <p>15 MS. KASDIN: Asked and answered. This is</p> <p>16 getting repetitive.</p> <p>17 A. What did you say? I didn't hear what you</p> <p>18 said.</p> <p>19 Q. (By Mr. Wilson) I asked, you don't have any</p> <p>20 idea how you came by the money to purchase the cocaine</p> <p>21 that you already pled guilty to?</p> <p>22 MS. KASDIN: Object to the form of the</p> <p>23 question.</p> <p>24 A. A friend.</p> <p>25 Q. (By Mr. Wilson) So when you're arrested and</p>	<p style="text-align: right;">Page 36</p> <p>1 that you're telling me you don't have any money to pay</p> <p>2 for use of the telephone, correct?</p> <p>3 A. Correct.</p> <p>4 MS. KASDIN: Object to the form.</p> <p>5 Q. (By Mr. Wilson) Did I understand your</p> <p>6 testimony correct, Mr. Dennis?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. And your family knew you were in jail</p> <p>9 in December, correct?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. Did they make any attempt to call you?</p> <p>12 MS. KASDIN: Object to the form?</p> <p>13 A. No.</p> <p>14 Q. (By Mr. Wilson) Do you know why?</p> <p>15 A. No.</p> <p>16 MS. KASDIN: Object. My apologies.</p> <p>17 Q. (By Mr. Wilson) Are you wearing a watch</p> <p>18 today, Mr. Dennis?</p> <p>19 A. Yes.</p> <p>20 Q. Could you hold that up to the camera, please,</p> <p>21 so I can just take a quick picture of it?</p> <p>22 A. (Witness complies.)</p> <p>23 Q. Can you tell me what kind of watch that is?</p> <p>24 A. Invicta.</p> <p>25 Q. How do you spell that?</p>
<p style="text-align: right;">Page 35</p> <p>1 you're advised that, you know, it will take \$4,000 to</p> <p>2 bail you out of jail, why do you not contact family or</p> <p>3 friends to try and come up with the bond money?</p> <p>4 A. Because I don't --</p> <p>5 MS. KASDIN: Object to the form of the</p> <p>6 question.</p> <p>7 A. To place a phone call, I don't have the money</p> <p>8 to place a phone call.</p> <p>9 Q. (By Mr. Wilson) Well, your -- your family</p> <p>10 knew that you were in jail, right?</p> <p>11 A. Correct.</p> <p>12 MS. KASDIN: I'm going to ask if we could just</p> <p>13 take a short break here, if everyone is okay with that?</p> <p>14 MR. WILSON: Sure. Five minutes?</p> <p>15 MS. KASDIN: That should work. Thank you.</p> <p>16 (A recess was taken from 10:05 a.m. to</p> <p>17 10:12 a.m.)</p> <p>18 Q. (By Mr. Wilson) Mr. Dennis, you recognize</p> <p>19 you're still under oath?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. I'm -- and I'm not trying to wrestle</p> <p>22 with you about any of these issues. I'm just -- most</p> <p>23 folks -- most folks when they get in jail try and make</p> <p>24 bond, and I'm just trying to figure out why in your</p> <p>25 situation that's not taking place. And I understand</p>	<p style="text-align: right;">Page 37</p> <p>1 A. I-N-C-T-I-A (sic).</p> <p>2 Q. And how did you get that watch?</p> <p>3 A. It's a present.</p> <p>4 Q. From?</p> <p>5 A. Girlfriend, previous girlfriend.</p> <p>6 Q. And her name?</p> <p>7 A. Camille.</p> <p>8 Q. What's her last name?</p> <p>9 A. Sirls.</p> <p>10 Q. Could you spell it, please?</p> <p>11 A. Sirls with an S.</p> <p>12 Q. G-I-R-L-S?</p> <p>13 A. Yes.</p> <p>14 Q. And where does she live?</p> <p>15 A. She stays in Tulsa.</p> <p>16 Q. She have a house here?</p> <p>17 A. She has an apartment.</p> <p>18 Q. Where at?</p> <p>19 A. Town Square.</p> <p>20 Q. Do you have her phone number?</p> <p>21 A. No, I don't. Her number just currently</p> <p>22 changed. I don't have her current number.</p> <p>23 Q. Are you dating her at the moment?</p> <p>24 A. No.</p> <p>25 Q. Are you dating anyone at the moment?</p>

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1/25/2021

11 (38 - 41)

<div>Page 38</div> <div>1 A. No.</div> <div>2 Q. Okay. How did you get to the deposition</div> <div>3 today?</div> <div>4 A. With attorney's help.</div> <div>5 Q. And can you explain physically how that</div> <div>6 occurred?</div> <div>7 A. They contacted the Lift program, Ms. Phoebe</div> <div>8 arranged for a ride here for the deposition this</div> <div>9 morning.</div> <div>10 Q. Very good. So there was someone who picked</div> <div>11 you up and will take you back home; is that right?</div> <div>12 A. Correct.</div> <div>13 Q. Okay. Thank you. Tell me about James Pharr?</div> <div>14 MS. KASDIN: Object to the form of the</div> <div>15 question.</div> <div>16 A. The -- my bail bondsman?</div> <div>17 Q. (By Mr. Wilson) Yes, sir.</div> <div>18 A. He's a bail bondsman.</div> <div>19 Q. And how do you know him?</div> <div>20 A. Through a friend. His stepdaughter. I was</div> <div>21 friends with his stepdaughter.</div> <div>22 Q. What's his stepdaughter's name?</div> <div>23 A. I think -- I don't remember her name. I'm not</div> <div>24 -- I'm not sure on that name. I haven't spoken to her</div> <div>25 in awhile. I don't remember her name.</div>	<div>Page 40</div> <div>1 THE REPORTER: Do you want Mr. Dennis to read</div> <div>2 and sign?</div> <div>3 MS. KASDIN: Yes.</div> <div>4 THE REPORTER: Thank you.</div> <div>5 MR. WILSON: Thank you, Mr. Dennis. You have</div> <div>6 a good day.</div> <div>7 THE WITNESS: You guys have a good day.</div> <div>8 MR. WILSON: All righty. Bye-bye.</div> <div>9 (Deposition concluded at 10:19 a.m.)</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div>
<div>Page 39</div> <div>1 Q. That's fine. How many times have you spoken</div> <div>2 with Mr. Pharr or Pharr, I'm sorry?</div> <div>3 A. Just the time I called to see about getting</div> <div>4 him for bail.</div> <div>5 Q. And could you tell me about that conversation?</div> <div>6 What did you ask him?</div> <div>7 A. Basically asked him what would he need far as</div> <div>8 amount of money to help me get out of jail.</div> <div>9 Q. And do you recall what he said?</div> <div>10 A. He said I would need a cosigner and I don't</div> <div>11 remember the dollar amount that he said that he would</div> <div>12 need. I know it was out of my range, so...</div> <div>13 Q. Do you think it's fair for the State to</div> <div>14 require someone to post bail so that they can be out of</div> <div>15 jail --</div> <div>16 MS. KASDIN: Object --</div> <div>17 Q. (By Mr. Wilson) -- prior to trial?</div> <div>18 MS. KASDIN: Object to the form.</div> <div>19 A. Yes.</div> <div>20 MR. WILSON: I don't have any other questions.</div> <div>21 I'll pass the witness. Thank you, sir.</div> <div>22 MS. MOORE: Phoebe?</div> <div>23 MS. KASDIN: Nothing from me. Thank you.</div> <div>24 MS. MOORE: Okay. I'm going to reserve all my</div> <div>25 further questions and conclude this deposition.</div>	<div>Page 41</div> <div>1 JURAT</div> <div>2 FELTZ VS. BOARD OF COUNTY COMMISSIONERS</div> <div>3 JOB FILE NO. 148999</div> <div>4 STATE OF OKLAHOMA</div> <div>5 SS</div> <div>6 COUNTY OF TULSA</div> <div>7 I, ASHTON DENNIS, do hereby state under oath</div> <div>8 that I have read the above and foregoing deposition in</div> <div>9 its entirety and that the same is a full, true and</div> <div>10 correct transcription of my testimony so given at said</div> <div>11 time and place, except for the corrections noted.</div> <div>12</div> <div>13</div> <div>14</div> <div>15 Signature of Witness</div> <div>16</div> <div>17 Subscribed and sworn to before me, the</div> <div>18 undersigned Notary Public in and for the State of</div> <div>19 Oklahoma by said witness, ASHTON DENNIS, on this</div> <div>20 _____ day of _____, 2020.</div> <div>21</div> <div>22</div> <div>23</div> <div>24 NOTARY PUBLIC</div> <div>25 MY COMMISSION EXPIRES: _____</div>

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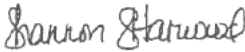
Exhibit 16

Ashton Dennis

1/25/2021

12 (42 - 43)

1	ERRATA SHEET	Page 42
2	FELTZ VS. BOARD OF COUNTY COMMISSIONERS	
3	DEPOSITION OF ASHTON DENNIS	
4	REPORTED BY: SHANNON S. HARWOOD, CSR, RPR, CRR	
5	DATE OF DEPOSITION TAKEN: JANUARY 25, 2021	
6	JOB FILE NO. 148999	
7	PAGE LINE IS SHOULD BE	
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25	_____	

1	CERTIFICATE	Page 43
2		
3	STATE OF OKLAHOMA)	
4	COUNTY OF TULSA)	
5		
6	I, Shannon S. Harwood, a Certified Shorthand	
7	Reporter in and for the State of Oklahoma, do hereby	
8	certify that the foregoing is a true and correct	
9	transcription of my shorthand notes of proceedings had	
10	in Case Number 18-cv-0298-CVE-JFJ heard on the 25th day	
11	of January, 2021, and is only valid with my stamped seal	
12	and my original signature.	
13	I further certify that I am not related to nor	
14	attorney for either of said parties nor otherwise	
15	interested in said action.	
16	IN WITNESS WHEREOF, I have hereunto set my hand and	
17	seal this 1st day of February, 2021.	
18		
19		
20		
21		
22		
23	Shannon S. Harwood, CSR, RPR, CRR	
24		
25		

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Exhibit 16